

1 Scott E. Gizer, Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, NV 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Attorneys for Defendants
12 OLD REPUBLIC NATIONAL TITLE INSURANCE
13 COMPANY, OLD REPUBLIC TITLE INSURANCE
14 GROUP, INC. and OLD REPUBLIC TITLE OF NEVADA

15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 WELLS FARGO BANK, N.A., AS
13 TRUSTEE, ON BEHALF OF THE
14 HOLDERS OF THE HARBORVIEW
15 MORTGAGE LOAN TRUST MORTGAGE
16 LOAN PASS-THROUGH CERTIFICATES,
17 SERIES 2006-12,

18 Plaintiff,

19 vs.

20 OLD REPUBLIC TITLE INSURANCE
21 GROUP, INC., et al.,

22 Defendants.

Case No.: 2:20-cv-01461-JCM-NJK

**ORDER GRANTING STIPULATION
TO EXTEND DEFENDANTS' TIME
TO RESPOND TO COMPLAINT**

(First Request)

23 Defendants Old Republic National Title Insurance Company (“ORNTIC”), Old Republic
24 Title Insurance Group, Inc., and Old Republic Title of Nevada (“ORTN”) (collectively,
25 “Defendants”) and plaintiff Wells Fargo Bank, N.A., as Trustee, on Behalf of the Holders of the
26 Harborview Mortgage Loan Trust Mortgage Loan Pass-Through Certificates, Series 2006-12
27 (“Wells Fargo”) (collectively, the “Parties”), by and through their counsel of record, hereby
28 stipulate as follows:

1 **WHEREAS**, Wells Fargo commenced the action by filing a Complaint on August 5,
2 2020, in the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-20-
3 819092-C).

4 **WHEREAS**, on August 6, 2020, ORNTIC filed a Petition of Removal with this Court,
5 based upon diversity jurisdiction (ECF No. 1);

6 **WHEREAS**, on August 20, 2020, Wells Fargo served ORTN with the complaint pursuant
7 to the executed summons filed on August 31, 2020 (ECF No. 7);

8 **WHEREAS**, on August 26, 2020, Wells Fargo purported to serve the complaint upon
9 ORNTIC;

10 **WHEREAS**, on September 8, 2020, Wells Fargo filed a Motion to Remand to state court
11 (ECF No. 10);

12 **WHEREAS**, ORTN's response to the complaint is due on September 10, 2020 and if
13 served on August 26, 2020, ORNTIC's response to the complaint is due on September 16, 2020;

14 **WHEREAS**, Defendants' counsel is requesting an extension of time to respond to the
15 complaint to afford Defendants' counsel additional time to review, analyze and respond to Wells
16 Fargo's complaint;

17 **WHEREAS**, Wells Fargo does not oppose the extension and has agreed to extend
18 Defendants' time to respond to the complaint to on or before September 23, 2020; and

19 **WHEREAS**, this is the first stipulation for an extension of Defendants' time to respond to
20 the complaint.

21 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
22 and agree as follows:

- 23 1. Defendants shall respond to the complaint on or before September 23, 2020.
- 24 2. Defendants intend to preserve their rights and do not expressly waive any and all
25 defenses listed in Fed. R. Civ. P. 12(b), including by way of example only, and without limitation,
26 with respect to whether they are subject to personal jurisdiction in this forum, and with respect to
27 whether service of process of the complaint and summons were adequate.

28 ///



1 DATED this 10th Day of September, 2020

DATED this 10th Day of September, 2020

2 WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

3
4 */s/-Lindsay D. Robbins*

/s/-Sophia S. Lau

5 By: _____

By: _____

6 Darren T. Brenner
7 State Bar No. 8386
8 Lindsay D. Robbins
9 State Bar No. 13474
10 7785 W. Sahara Ave, Suite 200
11 Las Vegas, NV 89117

Scott E. Gizer
State Bar No. 12216
Sophia S. Lau
State Bar No. 13365
8716 Spanish Ridge Ave., Ste. 105
Las Vegas, NV 89148

12 Attorneys for Plaintiff
13 WELLS FARGO BANK, N.A.

Attorneys for Defendants
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY, OLD REPUBLIC
TITLE INSURANCE GROUP, INC. and
OLD REPUBLIC TITLE OF NEVADA

14 **ORDER**

15 **IT IS SO ORDERED:**

16 Dated: September 11, 2020

17 By:  _____

18 **Nancy J. Koppe**
19 **United States Magistrate Judge**